



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

RESPONSIVENESS SUMMARY TO COMMENTS RECEIVED DURING PUBLIC NOTICE For Proposed Air Quality Control Permit Number 1000151

All American Pipeline Company, La Paz Pumping Station
Begin Public Notice : November 5, 1997
End Public Notice : December 8, 1997

The following comments were submitted by All American Pipeline Company.

Comment 1: AAPL is not certain that the serial number for T3 is correct. The verified (or corrected) serial number will be sent to ADEQ.

Response: Per telephone conversation with Mark Olson of AAPL, the serial number is correct. Therefore, no correction needs to be made.

Comment 2: Typographical errors in Table 1 Summary of Permit Requirements need to be corrected.

Response: The corrections have been made.

Comment 3: Monitoring & Recordkeeping Requirements (A.)(2.)(b.) - AAPL requested authorization to add GPA Standard 2377-86 ("length of strain" test) as an approved method for sulfur monitoring.

Response: ADEQ does not accept any test method other than EPA approved methods. Permittee may request EPA Regional IX for approval. This request will not be added to the permit.

Comment 4: The EPA does not agree that Pinal County's proposal for "a single source test during the permit term," However, the EPA has suggested that the requirement could be met by testing the turbine units in back to back years which would be allowed by an "every other year" schedule, provided that the initial two tests adequately demonstrated compliance with NSPS-Subpart GG, NOx emissions limitations. AAPL has requested ADEQ's reconsideration of the annual source testing requirement which is being proposed for both the La Paz and Hot Springs Draft Title V operating Permits.

Response: Pursuant to Arizona Testing Manual for Air Pollution Emissions, "major sources having multiple emission points must submit facility test schedules assuring annual testing of major emission points and rotational testing of minor emissions points". Since three turbines are identical and each is a minor emission point, Section IV.A of Attachment B has been rewritten to read as follows:

“Permittee shall conduct or cause to be conducted an annual performance test on **one of the three turbine engines** for Nitrogen Oxide (NOx) emissions. **Prior to the performance test, Permittee shall request, in writing, the designation by ADEQ of which turbine is to be tested.** Each annual test shall be completed prior to each anniversary date of this permit issuance. Test method specified in Section IV.B of this Attachment shall be used.”

The following comments submitted by El Paso Natural Gas Company are applied to All American Pipeline Company.

TABLE 1 : Summary of Permit Requirements

<i>Comment 1:</i>	<i>SOx Monitoring/Recordkeeping for P1, P2, P3, P4 - The “< 0.017 wt% (5gr/scf) should be replaced with “< 0.8 percent by weight” since the sulfur dioxide standard in R18-2-719.J references 0.8 weight percent.</i>
<i>Response:</i>	FERC agreement limits sulfur content in natural gas to less than 5 gr/scf which is equivalent to 0.017 weight percent. NSPS 40 CFR 60.333 require to limit the sulfur content to less than 0.8 weight percent. FERC stipulated 0.017% was specified as a reference. This has been removed to make the table consistent with the statements in permit conditions II.A.1 of Attachment “B”. The table has been updated to reflect this change.
<i>Comment 2:</i>	<i>F3. - Spray Painting. The language in parentheses should be after “MSDS of paints used” so that it will be consistent with Attachment B.II.C.2.a.</i>
<i>Response:</i>	The language in parentheses has been moved to follow “MSDS of paints used” in the summary table to be consistent with the permit condition II.C.2.a. in Attachment B.